

## RESPONSE TO COMMENTS

### General NPDES Permit for Seafood Processors Operating Shorebased Facilities in Kodiak, Alaska

Public Comments were Received from the Following:

- 1 Alaska, Department of Fish and Game, Habitat and Restoration Division: C. Wayne Dolezal, Habitat Biologist, Region II.
- 2 Kodiak Fishmeal Company: John T. Sullivan, President.
- 3 Kodiak Island Borough: Linda L. Freed, Director, Community Development Department.
- 4 Ocean Beauty Seafoods, Inc: Jim Yonker, Director, Corporate Quality Assurance.
- 5 Western Alaska Fisheries, Inc: Robert J. Thomas, Corporate Secretary.

#### **General Comment**

Kodiak Island Borough: Conceptually the Borough supports the issuance of general permits as a method of reducing paperwork, time and expense by permittees, permitting agencies, reviewing agencies and the public. Specifically, the Borough supports the issues of this permit since there appears to be no reduction in regulatory oversight that might result in environmental degradation and reduces the administrative burden associated with individual permit reviews. The Borough also relies on Alaska Department of Environmental Conservation to insure that the technical aspects of the permit are consistent with state water quality standards.

#### **Ocean Dumping Site**

**Comment:** Alaska Department of Fish and Game (ADF&G) commented that Section 3.5 while mentioning the ocean dumping site, the site is not defined and a map was not included in the draft permit. ADF&G also recommended that solid wastes disposed of in the ocean dumping site be ground to 0.5 inch particle size prior to discharge to avoid the potential for creation of zones of deposit.

**Response:** A map of the ocean dumping site has been included in the final permit under Section 11.3 and a definition of “ocean dumping site” has been included in the definition portion of the permit in Section 10. Also in Part 3.5, Waste Disposal Practice, a requirement that solid seafood processing wastes to be disposed of in the ocean dumping site shall be ground to 0.5 inch particle size prior to discharge.

**Comment:** Kodiak Fishmeal Company (KFC) commented that Section 3.5 prohibits the ocean dumping except if the waste is unsuitable for processing at a by-product recovery facility. KFC proposes that

Section 3.5 be modified to permit individual permittees to ocean dump if KFC is incapable of transporting the excess fish waste to the ocean dumping site.

Western Alaska Fisheries also commented on Section 3.5 and stated that they would prefer having the option to transport excess fish waste to ocean dumping site themselves.

**Response:** The final permit includes a new section allowing individual permittees to transport solid seafood wastes to the ocean dumping site upon notification and approval of EPA and ADEC. The processing wastes must be ground to 0.5 inch particle size prior to dumping and logs (as described in Section 3.5.3) must be submitted with the monthly reports.

### **Grinding before Screening**

**Comment:** KFC and Western Alaska Seafoods both stated that when KFC exceeds its capacity and is not able to transport all of the fish wastes to the ocean dumping site, then the individual permittees need to be able to grind the solid fish wastes before screening and transport to the ocean dumping site.

**Response:** Section 3.1 prohibits grinding before screening. This provision is in the permit for the benefit of the permittees. Grinding before screening has the potential of exceeding the permit butchering limitations because the smaller size waste solids may go through the screens. However, in the situation where a permittee does not have the capability of grinding after the screens and must also transport its own solid wastes to the dumping site, grinding before screening will be allowed; this information must be included in the notification to EPA and ADEC. Also if the grinding before screening results in permit limitation exceedances, then the permittee must report in accordance with the noncompliance reporting requirements in Sections 7.1.1 and 7.1.2. Visual monitoring during the period of grinding before screening will need to be extra diligent to assure that floating solids and shoreline accumulations do not occur.

### **Individual Waste Stream Flow Monitoring**

**Comment:** Ocean Beauty commented on Section 3.2.3 which required flow measurement of the surimi waste stream. Ocean Beauty believes that this restricts plants that do not have the physical capabilities to monitor the water used for surimi processing only.

**Response:** The permit requires flow measurement of each waste stream because it is necessary to know the flow in order to calculate the quantity of pollutants discharged into the receiving water. It is EPA's understanding that flow measurements in the Kodiak plants have been estimated in the past rather than using the total 24-hour water usage measured by the city flow meters. The final permit will allow permittees to propose a method to estimate the flow used in individual waste streams where there is no dedicated flow meter. The explanation as to how the flow is estimated is required shall the first monthly report submitted after the permit is effective or when the estimated flow is initiated. The sample type column on the DMR should also be filled out to show that the reported flow value is estimated.